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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA, *ex
rel.* SCISSORS LLC,

Plaintiffs,

v.

REMA TIP TOP OF AMERICA, INC.,
REMA TIP TOP/NORTH AMERICA,
INC., C&J WELDING &
CONSTRUCTION, LLC, NEXGEN
INDUSTRIAL SERVICES, INC., and
INDUSTRIAL SERVICES GROUP,
INC. d/b/a UNIVERSAL BLASTCO,

Defendants.

HON. JULIEN X. NEALS

Civil Action No. 23-20790 (JXN) (JSA)

**UNITED STATES' NOTICE OF
ELECTION TO INTERVENE FOR
THE PURPOSE OF SETTLEMENT**

FILED IN CAMERA & UNDER SEAL

The United States, pursuant to the False Claims Act, 31 U.S.C. §§ 3730(b)(2) and (4) hereby notifies the Court of its election to intervene for settlement purposes. The United States, Scissors LLC, C&J Welding & Construction, LLC (“C&J Welding”), NexGen Industrial Services, Inc. (“NexGen”), and Industrial Services Group, Inc. d/b/a/ Universal Blastco (“ISG”) have reached a settlement of the claims in the action.

Specifically, the United States intervenes in this action with respect to civil claims predicated upon the following factual allegations (the “Covered Conduct”):

The United States contends it has certain civil claims against C&J Welding, NexGen, and ISG arising from their knowing submission of false loan and loan forgiveness applications for the Forgiven PPP Loans (defined in the Settlement Agreement) during the Relevant Time Period. Specifically, the United States contends that Defendants knowingly failed to fully disclose their affiliates, including Rema Tip Top of America, Inc. (“Rema”) on their Forgiven PPP loan applications, and C&J Welding, NexGen, and ISG falsely certified eligibility for PPP loans and loan forgiveness. Because of their affiliation with each other and with other entities, C&J Welding, NexGen, and ISG exceeded the employee and/or revenue-based eligibility limits for PPP loans and loan forgiveness. C&J Welding, NexGen, and ISG were therefore too large to qualify for the Forgiven PPP loans that they received.

The United States declines intervention with respect to all other claims alleged against the Defendants apart from those based upon the Covered Conduct.

Pursuant to the terms and conditions of the settlement agreement, a stipulation of dismissal will be filed following the payment of the settlement amount.

The United States requests that the Complaint, the Government’s Notice of Election, and this notice be unsealed; all other papers or Orders on file in this matter remain under seal; and the seal be lifted on all pleadings filed in this action

after the filing of this Notice of Election.

The United States is filing a proposed Order to this effect.

Dated: June 13, 2025
Newark, New Jersey

Respectfully submitted,

ALINA HABBA
United States Attorney

By: /s/ Susan Pappy
Susan J. Pappy
Assistant U.S. Attorney
Attorneys for the United States